

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604



REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC AND CERTIFIED MAIL

February 19, 2008

Jennifer Hale Environment Health & Safety, WTC 2G2 P.O. Box 9777 Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site Plainwell Mill Banks Emergency Action Request to Place Containment and Erosion Control in Area D

Dear Ms. Hale:

Weyerhaeuser Company (Weyerhaeuser) is currently conducting an emergency action on the banks and floodplains of the Kalamazoo River adjacent to the Plainwell Mill (the Site) under the terms of a Consent Decree with the United States Environmental Protection Agency (EPA), Civil Action No. 1:05 CV0003 (CD). On February 12, 2008, Weyerhaeuser notified EPA via phone call that during the February 5th, 2008 excavation of the far eastern portion of Area D, denoted on Figure 1, an oily sheen was noted on the water. RMT – Weyerhaeuser's general contractor for the project – responded by booming the area, covering the area with clay and installing river rock as erosion control. Additionally, RMT collected samples along the rest of Area D to delineate additional locations where similar conditions may exist, i.e. subsurface non-paper residual material contaminated with polychlorinated biphenyls (PCB) at concentrations similar to confirmation samples taken in Area D where the oily sheen was noted.

Weyerhaeuser requested via phone call on February 13, 2008, approval to place cover and erosion control over the area shaded in brown on Figure 1 in lieu of excavation of the area. EPA is approving the placement of cover and erosion control over the area shaded brown on Figure 1 as an interim measure. While this interim measure is in place, EPA expects additional information be gathered to determine:

- 1. The cause of the oily sheen observed during the late January excavation, including consideration of whether a non-aqueous phase liquid (NAPL) was the cause;
- 2. Whether NAPL is the cause of high PCB concentrations at sample locations: PM-SD-041, PEX-1, and PEX-2; and
- 3. Whether NAPL, if present, could be entering into the Kalamazoo River.

Plans to gather this additional information should be proposed to EPA and the Michigan Department of Environmental Quality (MDEQ) no later than March 5, 2008, with implementation of the plans to begin within five calendar days of EPA's approval of the plans.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the project.

Sincerely,

Sam Chummar, Remedial Project Manager

U.S. EPA Region 5

Superfund Division - Remedial Response Branch #1

77 W Jackson Blvd. (SR-6J)

Chicago, IL 60604

cc: Eileen Furey, C-14J

James Saric, SR-6J Michael Berkoff, SR-6J

Paul Bucholtz, MDEQ

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